

m/045/038



United States Department of the Interior

BUREAU OF LAND MANAGEMENT
Salt Lake District Office
2370 South 2300 West
Salt Lake City, Utah 84119

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MINERALS PROGRAM
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FEB 13 1992

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Jerry Blossom
Environmental Coordinator
Union Pacific Minerals
P.O. Box 7
Fort Worth, Texas 76101-0007

DIVISION OF
OIL GAS & MINING

Dear Mr. Blossom,

This letter is a summary of the meeting you attended on January 23, 1992 in the Salt Lake District to discuss the Lakeside Mountain Project. In attendance were representatives from Utah Division of Oil, Gas and Mining, and Salt Lake District, BLM. This letter was prepared in cooperation with UDOGM.

We request that you amend the plan-of-operations to include all measures to mitigate significant impacts identified in the scoping process. This could allow approval of the plan without any additional mitigation. The following summary is divided into general comments and comments that require a plan amendment.

General Comments

Air Quality - Please submit modeling information and copies of any permit applications. The purpose of these submissions is to provide data in support of the effected environment and environmental consequences portion of the EA. Chlorine emissions from Magcorp do effect air quality at the quarry at times; were these emissions evaluated in the air quality modeling?

Water Quality - Potential wildlife and livestock watering, and salinity effects on reclamation of land were discussed. The BLM expressed concerns that dust suppressants might limit your ability to reclaim the lands. Could non-saline dust control, such as asphaltic mixes be used?

Further information can be obtained from two producers of such products by contacting: Georgia Pacific Corporation ("Lignosite-road binder), or Phillips 66 (Asphalt Emulsion CRS and SS1, phone (918) 661-8327). You stated that water quality data specific to the quarry area was not available since water had not been encountered in any of the drill holes.

BLM will inventory area for ferruginous hawk nests by mid-March. These hawks are a sensitive species (category 2) and may be listed.

Comments to be Addressed in a Plan Amendment

The reclamation standard for vegetative cover was discussed. Your proposed standard is based on annuals (cheat grass) and may not be achievable or desirable. It was recommended that a nearby area containing perennial vegetation be used for the vegetative standard. Additional inventory data would be necessary to establish the new vegetation standard.

It was recommended that yearly topsoil reports be submitted to detect deviations from anticipated salvageable topsoil amounts.

Topsoil salvaged from the quarry area is to be stockpiled in a series of windrows in various locations parallel to wind when feasible. This would allow the topsoil to be stabilized until needed. Topsoil stockpiles are to be signed "topsoil, do not disturb" and should be revegetated with an interim seed mix to control wind and water erosion. A tackifier may be necessary as a temporary means of holding the finer textured topsoil material in place until the interim revegetation becomes established. Topsoil salvage is to include soil below waste rock dumps.

Place crusher fines on the surface of back filled pits as a subsoil substitute. This would reduce the amount of topsoil falling into spaces between coarse rock.

Could waste rock disposal area 2 be reclaimed earlier in mine life and not moved? Please estimate how much the pits would be back filled if this was done; consider leaving a rock face in pit 7 for raptor nesting. The Division commented that an exposed rock face in Pit 7 for possible raptor nesting site does not outweigh the safety and reclamation benefits of having a pit back filled. Are we reasonably confident that the cliff will indeed be used by raptors for nesting?

The Division would like to see the proposed configuration of the pit with the exposed rock face before totally ruling this option out. A variance request with appropriate justification would ultimately need to be approved by this Division to allow the high wall to remain.

Mulch is to be included in reclamation on page 52. The mulch should be crimped into the surface to help stabilize the exposed soil. It is also recommended that test plots that emphasize shrub revegetation be used to develop additional site specific data.

Add four-wing saltbush and globe mallow and kochia in place of yellow sweet clover to seed mixture on page 54.

Install cattleguards where roads cross range fences. Show location of project fences.

The BLM requests that the filing for the water well be a joint MERR\BLM water right.

The disturbance acreage calculations need to be revised to reflect total disturbance. Areas needing revision include haul road and quarry area.

Comments Received Utah Division of Oil, Gas and Mining

R647-4-105.2.12 Maps, Drawings & Photographs.

The permit boundary for the mine site does not include the access road of the haul road. These disturbed areas will need to be included. MERR will need to provide revised maps and estimates of these disturbances.

R647-4-106.1 Operation Plan.

A description of the particle size of the waste rock will need to be provided. The waste was described as being composed of the desert limestone and a cherty zone of the deposit. The size of this material will influence the stability of the back filled pits as well as the revegetation success. Crusher fines were also included in the waste dumps.

R647-4-110.3 Reclamation Practices.

The plan describes the structures as being demolished and disposed in the back fill. Does this imply placing the debris into the pit as back fill material? If so, the structures should be covered by a minimum depth of 3-4 feet of waste rock material.

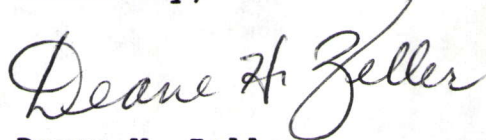
R647-4-113 Surety.

The plan proposed posting surety for the predicted disturbance through year 5 of the project. The proposed amount of \$1,107,000 balances out to be between \$7,429 and \$9,543 per acre depending on the acreage (149 acres & 116 acres respectively). While this dollar amount is above and beyond the Division average, the acreage associated with the road disturbances will need to be included in the estimate and

dollar amount adjusted accordingly. Also, the estimate will need to include the 5-year escalation and possibly the 10% contingency. Because of the high dollar per acre amount, the 10% contingency may not be necessary or appropriate.

Thank you for your cooperation in this matter. If you have any questions, please contact Steve Brooks at 977-4371.

Sincerely,

A handwritten signature in cursive script that reads "Deane H. Zeller". The signature is written in dark ink and is positioned above the printed name and title.

Deane H. Zeller
District Manager

cc: UDOGM, Wayne Hedberg